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July 28, 2016

**VIA EMAIL AND FIRST CLASS MAIL**

The Hon. Karen V. Gregory  
Secretary of Federal Maritime Commission  
800 North Capitol St.  
Room 1046  
Washington, D.C. 20573

Re: Docket No. 15-11 – Ovchinnikov v. Hitrinov

Dear Ms. Gregory:

Enclosed for filing in the above-captioned matter are an original true copy and five (5) additional copies of:

1. Respondents' Motion for Extension of Time

Please contact me if you have any questions.

Best regards,

  
Anjali Vohra

Enclosures

**FEDERAL MARITIME COMMISSION**

**WASHINGTON, D.C.**

**DOCKET NO. 15-11**

**IGOR OVCHINNIKOV, ET AL**

**v.**

**MICHAEL HITRINOV, ET AL**

**Consolidated With**

**DOCKET NO. 1953(I)**

**KAIRAT NURGAZINOV, ET AL**

**v.**

**MICHAEL HITRINOV, ET AL**

**RESPONDENTS' MOTION FOR EXTENSION OF TIME**

Pursuant to FMC Rules 69 and 71, Respondents Empire United Lines and Michael Hitrinov hereby move for an extension until August 9, 2016 to reply to Complainants' Response to Order for Parties to Supplement the Record (the "Reply").<sup>1</sup> The reason for this request is that Counsel for Respondents will be effectively unavailable to work on the Reply between the time it was filed at 11:30 pm on July 26, 2016 and the date it is currently due, August 2, 2016.

In particular, since yesterday, July 27, and through Saturday, July 30, Counsel is in New Jersey attending to obligations to the United States Department of Justice as well as responsibilities relating to the passing of his father. Counsel will technically be back in the office

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<sup>1</sup> Although the Presiding Officer denied the request to extend the date for filing the original supplement to the record, which would have automatically extended the date for the Reply, no motion specific to the Reply has been made or addressed.

on Sunday, July 31, but will be in proceedings relating to obligations to the United States Department of Justice from Sunday, July 31 through Tuesday, August 2.

Although Counsel may from time-to-time have small amounts of time to spend on the Reply, it is unlikely to amount to more than a couple of hours, much less than required for Respondents to have a fair opportunity to respond on the merits of Complainants Response and its 279 pages of Exhibits.

Should the presiding officer require additional details regarding Counsel's obligations and schedule through August 2, the undersigned would be happy to provide additional information to the Presiding Officer *in camera*.

For the foregoing reasons, Respondents respectfully request that the foregoing motion for extension of time be granted.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Eric Jeffrey", is written over a horizontal line.

Eric Jeffrey  
Anjali Vohra

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**CERTIFICATE OF SERVICE**

I hereby certify that I have caused the foregoing Respondents' Motion for Extension of Time to be served by express courier to the following:

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Brooklyn, NY 11224  
Marcus.nussbaum@gmail.com

Seth M. Katz, Esq.  
P.O. Box 245599  
Brooklyn, NY 11224

Dated at Washington, DC, this 28<sup>th</sup> day of July, 2016.

  
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Anjali Vohra  
Counsel for Respondents